

1 The Honorable Ricardo S. Martinez
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1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON

1 THOMAS WEINSTEIN,

2 Plaintiff,

3 vs.

4 MANDARICH LAW GROUP, LLP.

5 Defendant.

6 NO. 2:17-cv-01897-RSM

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**DECLARATION OF THOMAS
WEINSTEIN IN SUPPORT OF
PARTIAL SUMMARY JUDGMENT**

Thomas Weinstein declares as follows:

1. I am the Plaintiff in this matter, am over the age of majority, and make this declaration of
2 my own personal knowledge.
3. In September 2014, I was served with a lawsuit from Mandarich Law Group.
4. While I was unsure of the validity of their claims, it did not matter since I was unable to
5 pay the amount I was being sued for and I could not afford an attorney, so I called
6 Mandarich to see what could be done to stop the case from progressing.
7. While on the call, I reached a settlement agreement with Mandarich. In exchange for an
8 up-front payment (followed by monthly payments charged automatically to my debit
9 card), the case would be resolved and any further actions would be stopped.

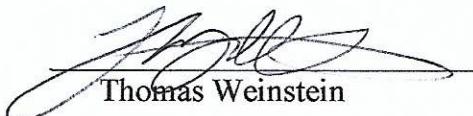
- 1 5. To facilitate the settlement, I gave Mandarich all of my payment information, including
- 2 my debit card number, expiration date, and other relevant information.
- 3 6. I hung up the call believing that the matter had been resolved.
- 4 7. A short time after the call, Mandarich sent me a letter confirming the agreement. A true
- 5 and correct copy of the letter I received from Mandarich is attached as **Exhibit A**.
- 6 8. To me, this letter confirmed that everything was taken care of and the agreement was
- 7 done.
- 8 9. Shortly after receiving the first letter, I received another letter from Mandarich. I was
- 9 confused by the letter, because I had already settled the case with them; we had
- 10 specifically discussed stopping the lawsuit in exchange for my payments with Mandarich.
- 11 10. The letter asked me to sign a “Stipulation for Judgment or Dismissal,” which I had never
- 12 heard of before. A true and correct copy of the letter is attached as **Exhibit B**.
- 13 11. I figured that the letter must be a mistake, because my understanding after talking on the
- 14 phone with Mandarich was that setting up the payment plan would stop litigation.
- 15 Mandarich continued taking my payments as agreed.
- 16 12. I was very surprised when Mandarich garnished my wages in April 2017. It was at that
- 17 time that I learned for the first time that Mandarich had a judgment against me.
- 18 13. This was very concerning to me, because I had an agreement with Mandarich that the
- 19 litigation would stop if I set up the payment plan.
- 20 14. Each month, Mandarich would send me notification letters stating that they were going to
- 21 charge my debit card. A sample of these letters is attached as **Exhibit C**.
- 22 15. When Mandarich garnished my wages in April 2017, I did not know what to do, as I was
- 23 so frustrated and felt hopeless. Mandarich simply would not stop, even though I had

1 simply would not stop, even though I had already agreed to pay them. This time, I
2 thought that their garnishment would finally stop everything.

3 16. However, in October 2017, Mandarich tried to garnish my wages again. I was scared for
4 my family's financial future, because Mandarich had already taken more from me than
5 we agreed to originally, and they wanted another \$1,347.43. That is not what I agreed to
6 back when I settled the case with Mandarich.

7 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
8 UNITED STATES AND THE STATE OF WASHINGTON THAT THE FOREGOING IS
9 TRUE AND CORRECT.

10 9 DATED this 2nd day of July, 2018 at Bothell, WA.

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Thomas Weinstein

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ANDERSON | SANTIAGO
787 MAYNARD AVE
SEATTLE WA 98101
(206) 395-2665/F (206) 395-271

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EXHIBIT A

MANDARICH LAW GROUP, LLP

Attorneys at Law

Christopher D. Mandarich, Esq.*

Ryan E. Vos, Esq.**

William Boaz, Esq., *Of Counsel****Ann E. McIntire, Esq., *Of Counsel*****William T. Sali, Esq., *Of Counsel******6301 Owensmouth Avenue, Suite 850
Woodland Hills, CA 91637
P: 855.826.8349; F: 818.888.1260

*Admitted in CA;

**Admitted in CA, ID, OR & WA

***Admitted in OR

****Admitted in CA & HI

*****Admitted in ID

October 06, 2014

THOMAS S WEINSTEIN

400 Blaine St

Seattle, WA 98109

Re: Authorization for recurring payments

Original Creditor: GE CAPITAL RETAIL BANK

Original Creditor Account No. [REDACTED] 5391

Current Creditor: CACH, LLC

Account No.: [REDACTED] 5742

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT, AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Dear THOMAS S WEINSTEIN,

Thank you for setting up an automated payment plan on the above referenced account. This letter confirms your authorization, dated 10/03/14, to charge your credit/debit card and/or deposit your postdated checks in accordance with the payment schedule set forth below:

All Payments

Payment Amount	Payment Date	Source
\$302.81	10/27/14	MastercardCredit
\$97.33	11/27/14	MastercardCredit
\$97.33	12/27/14	MastercardCredit
\$97.33	01/27/15	MastercardCredit
\$97.33	02/27/15	MastercardCredit
\$97.33	03/27/15	MastercardCredit
\$97.33	04/27/15	MastercardCredit
\$97.33	05/27/15	MastercardCredit
\$97.33	06/27/15	MastercardCredit
\$97.33	07/27/15	MastercardCredit
\$97.33	08/27/15	MastercardCredit
\$97.33	09/27/15	MastercardCredit
\$97.33	10/27/15	MastercardCredit
\$97.33	11/27/15	MastercardCredit
\$97.33	12/27/15	MastercardCredit
\$97.33	01/27/16	MastercardCredit
\$97.33	02/27/16	MastercardCredit
\$97.33	03/27/16	MastercardCredit
\$97.33	04/27/16	MastercardCredit
\$97.33	05/27/16	MastercardCredit
\$97.33	06/27/16	MastercardCredit
\$97.33	07/27/16	MastercardCredit
\$97.33	08/27/16	MastercardCredit
\$97.33	09/27/16	MastercardCredit
\$97.33	10/27/16	MastercardCredit
\$97.33	11/27/16	MastercardCredit

\$97.33	12/27/16	Mastercard
\$97.33	01/27/17	Credit
\$97.33	02/27/17	Mastercard
		Credit

If you have any questions or wish to make any changes to your payment plan, please contact **MANDARICH LAW GROUP, LLP** at **855-826-8349**.

Sincerely,
MANDARICH LAW GROUP, LLP

**CALLS TO AND FROM MANDARICH LAW GROUP MAY BE MONITORED AND/OR
RECORDED FOR COMPLIANCE PURPOSES.**

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EXHIBIT B

MANDARICH LAW GROUP, LLP

Attorneys at Law

6301 Owensmouth Avenue, Suite 850
Woodland Hills, CA 91367
P: 855.441.5983; F: 818.888.1260

Christopher D. Mandarich, Esq.*

Ryan E. Vos, Esq.**

William Boaz, Esq., *Of Counsel****

Ann McIntire, Esq., *Of Counsel*****

William T. Sali, Esq., *Of Counsel******

*Admitted in CA

**Admitted in CA, ID, OR & WA

***Admitted in OR

****Admitted in CA & HI

***** Admitted in ID

10/08/2014

THOMAS WEINSTEIN

400 Blaine St Apt A

Seattle, WA 98109-2944

Re: Settlement of CACH, LLC, Acct # [REDACTED] 5742 assignee of Ge Capital Retail Bank Acct # [REDACTED] 5391
CACH, LLC v. THOMAS WEINSTEIN and DOE WEINSTEIN
Case No. , KING

This office has been retained by CACH, LLC, in connection with your above-referenced account and pending lawsuit. We have proposed the following settlement terms as set forth in the enclosed Stipulation for Judgment or Dismissal. To accept these terms, you must provide our office with the following two items:

1. The signed Stipulation for Judgment or Dismissal on or before 10/18/2014; and
2. Your payments as agreed upon and set forth in the Stipulation.

PLEASE BE ADVISED THAT YOUR SUBMISSION OF PAYMENT WITHOUT RETURNING THE SIGNED STIPULATION DOES NOT RESULT IN AN AGREEMENT BETWEEN YOU AND CACH, LLC. FURTHER, CACH, LLC WILL DEPOSIT SAID PAYMENT, AND APPLY FUNDS TOWARDS THE OUTSTANDING BALANCE OWED ON THE ABOVE-REFERENCED ACCOUNT. SUBMISSION OF BOTH THE SIGNED STIPULATION AND PAYMENT PER THE TERMS IS REQUIRED TO CONSTITUTE AN AGREEMENT BETWEEN YOURSELF AND CACH, LLC.

If you are setting up post-dated checks with our office, we request that you ask your banking institution to notate your account to reflect that CACH, LLC is approved by you to conduct a payment transaction on your bank account.

If we do not receive both items within the timeframe stated above, we will proceed with the litigation against you.

Very truly yours,

Ryan Vos, Esq.

Enclosure: Stipulation for Judgment or Dismissal

THIS COMMUNICATION IS FROM A DEBT COLLECTOR AND IS AN ATTEMPT TO COLLECT A DEBT. ALL INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

ALL CALLS ARE MONITORED AND/OR RECORDED FOR COMPLIANCE PURPOSES

120020945742

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7 **SUPERIOR COURT, IN AND FOR THE COUNTY KING**
8 **STATE OF WASHINGTON**9
10 CACH, LLC,

11 Plaintiff,

12 vs.

13 THOMAS WEINSTEIN and DOE

14 WEINSTEIN,

15 Defendants.

Case No.:

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**STIPULATION FOR JUDGMENT
OR DISMISSAL**

Plaintiff, CACH, LLC (“Plaintiff”), and Defendant(s), THOMAS WEINSTEIN and DOE WEINSTEIN, (“Defendant(s)”), hereby stipulate:

1. Plaintiff and Defendant(s) enter into this Stipulation for Judgment or Dismissal to resolve all causes of action for the above-entitled case and Plaintiff shall promptly dismiss the pending action with prejudice should all payments be made as illustrated below. Parties further agree that should Defendants fail to perform as stated below that Plaintiff may enter judgment in this matter without notice to Defendant.

2. Defendants shall pay Plaintiff, and Plaintiff agrees to accept from Defendants as settlement in full of this action, the sum of \$3,028.05 (*which amount will not accrue interest*), in consecutive monthly payments, beginning with a minimum payment of \$302.81 on or before October 27, 2014 and followed by minimum monthly payments of \$97.33 on the 27th day of

STIPULATION FOR JUDGMENT
OR DISMISSAL-120020945742

MANDARICH LAW GROUP, LLP
6301 Owensmouth Avenue, Suite 850
Woodland Hills, CA 91367
T: 818.264.0111; F: 818.888.1260

1 each month thereafter until paid in full. All payments shall be made payable to CACH, LLC
 2 and received in our office located at 6301 Owensmouth Avenue, Suite 850, Woodland Hills,
 3 CA 91367. Upon all payments be performed as illustrated above, this Stipulation shall act as
 4 Dismissal with Prejudice for this cause.

5 3. If Defendant(s) fail(s) to pay any installments as required by this Stipulation, or
 6 Defendant(s) otherwise default(s) under this settlement agreement, Plaintiff may immediately,
 7 and without prior notice to Defendant(s), file a declaration regarding such nonpayment under
 8 this Stipulation and obtain ex parte judgment as set forth below less any payments made
 9 pursuant to this Stipulation and that Plaintiff may execute on the Judgment immediately upon
 10 entry:

11 **JUDGMENT SUMMARY:**

PRINCIPAL:	\$3028.05
FILING FEE:	\$240.00
EX-PARTE FEE:	\$30.00
ATTORNEY'S FEE:	\$200.00
TOTAL JUDGMENT:	\$3498.05
Post Judgment Interest Rate:	12% on total judgment
Judgment Debtor:	THOMAS WEINSTEIN and DOE WEINSTEIN
Judgment Creditor:	CACH, LLC

12 4. That any failure to enter Judgment upon Defendant(s)' failure to perform as
 13 stipulated shall not constitute a waiver of Plaintiff's right to enforce the provisions of this
 14 Stipulation, and Plaintiff may enter a Judgment upon any subsequent failure to perform by
 15 Defendants.

16 5. Plaintiff represents that it is the owner of the Account that is subject to this
 17 lawsuit and agrees that it will never transfer, assign, sell, hypothecate, renumber, or convey the
 18 Account and will acknowledge that the Account has been satisfied.

19 6. Defendants, its agents and representatives agree to forever release and discharge
 20 CACH, LLC, Mandarich Law Group, LLP, their representatives, parent company, affiliates,
 21 members, managers, shareholders, predecessors, attorneys, and authorized agents, from any and
 22 all rights, claims, demands and damages of any kind, known or unknown existing or arising in
 23

STIPULATION FOR JUDGMENT
 OR DISMISSAL-120020945742

MANDARICH LAW GROUP, LLP
 6301 Owensmouth Avenue, Suite 850
 Woodland Hills, CA 91367
 T: 818.264.0111: F: 818.888.1260

1 the future, resulting from or related in any way to this account(s) giving rise to CACH, LLC's
2 claim against Defendant(s).

3 7. Plaintiff, its agents and representatives agree to forever release and discharge
4 Defendants, and successors and assigns, from any and all rights, claims, demands and damages
5 of any kind, known or unknown existing or arising in the future, resulting from or related in any
6 way to this account giving rise to CACH, LLC's claim against Defendant(s).

7 8. In the event that any of the provisions of this Stipulation or any portion thereof is
8 held by a court of competent jurisdiction to be unenforceable and invalid, the validity and
9 enforceability of the enforceable portion of any such provision and of the remaining provisions
10 shall not be adversely affected.

11 9. The parties hereto agree and acknowledge that facsimile copies and/or signature
12 counterparts shall together constitute the original Stipulation.

13 10. Defendants acknowledge acceptance of service of the Summons, Complaint and
14 Notice to Service Members and Their Dependents in this action and as additional consideration
15 for this Stipulation for payment waive any objections to service of process, jurisdiction and
16 venue.

17
18 Dated: _____

19 THOMAS WEINSTEIN and DOE WEINSTEIN
20 *Defendant(s)*

21 Dated: _____

22 By: _____

23 CACH, LLC
24 *Plaintiff's Authorized Representative*

25 Dated: October 08, 2014

26 **MANDARICH LAW GROUP, LLP**

27
28 Ryan E. Vos, Esq.
29 Attorneys for Plaintiff

30
31 STIPULATION FOR JUDGMENT
32 OR DISMISSAL-120020945742

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34 **MANDARICH LAW GROUP, LLP**
35 6301 Owensmouth Avenue, Suite 850
36 Woodland Hills, CA 91367
37 T: 818.264.0111; F: 818.888.1260

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EXHIBIT C

Christopher D. Mandarich, Esq.*

*Admitted in CA

Van E. Vos, Esq.**

**Admitted in AK, CA, ID, OR & WA

William Boaz, Esq., *Of Counsel****

***Admitted in OR

Eivor R. Ozawa, Esq., *Of Counsel*****

****Admitted in HI

William T. Sali, Esq., *Of Counsel******

*****Admitted in ID

Eph A. Geller, Esq., *Of Counsel******

*****Admitted in NV

February 14, 2016

THOMAS S WEINSTEIN
AINE ST
LE, WA 98109-294411181
3027

11181



Current Creditor: CACH, LLC
Account No.: [REDACTED] 5742
Original Creditor: GE CAPITAL RETAIL BANK
Original Creditor Account No.: [REDACTED] 5391

THOMAS S WEINSTEIN,

accordance with your agreement with our office, and pursuant to your authorization, we will be debiting \$97.33 from your bank account on 2016-02-27. Please ensure these funds are available on or before the processing date.

Please feel free to contact our office toll-free at 1-855-441-5983 to discuss your account.

incredibly,

Mandarich Law Group, LLP

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

CALLS TO AND FROM MANDARICH LAW GROUP MAY BE MONITORED AND/OR RECORDED FOR COMPLIANCE PURPOSES.

This letter is being automatically generated based upon your agreed payment arrangement with us. The sending of this letter did not involve the particular review of your account by an attorney.

IMPORTANT INFORMATION CONTINUED ON THE REVERSE SIDE.



IMPORTANT NOTICE OF RIGHTS

We are required under state and/or federal law(s) to notify consumers of certain rights. This list does not include a complete list of rights you may have under state or federal laws or regulations. Federal Law or other state laws may also provide you with similar or even greater rights.

In California: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact The Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov. As required by law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted by the creditor to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

In Colorado: FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [HTTP://WWW.COLORADOATTORNEYGENERAL.GOV/CA](http://WWW.COLORADOATTORNEYGENERAL.GOV/CA). A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prevent a debt collector or collection agency from taking any other action authorized by law to collect the debt.

In Maine: Office Location: 9200 Oakdale Avenue, Suite 601, Chatsworth, CA 91311. Phone: 855.441.5983. Business hours: 8:00am & 5:00pm Monday through Friday Pacific.

In Massachusetts: Office Location: 9200 Oakdale Avenue, Suite 601, Chatsworth, CA 91311. Phone: 855.441.5983. Business hours: 8:00am & 5:00pm Monday through Friday Pacific. Massachusetts law requires that we inform you:

NOTICE OF IMPORTANT RIGHTS

You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

In Texas: Office Location: 9200 Oakdale Avenue, Suite 601, Chatsworth, CA 91311. Phone: 855.441.5983. Business hours: 8:00am & 5:00pm Monday through Friday Pacific.

In Utah: As required by Utah law, you are hereby notified that a negative credit report reflecting your credit record may be submitted by a creditor to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

IMPORTANT INFORMATION ABOUT CREDIT REPORTING

Our clients may report information about your account to credit bureaus.

Payment Instructions For Western Union Quick Collect

For your convenience in paying by Western Union, Please note the following instructions, if applicable:

- (1) Call Western Union at 1-800-325-6000 to locate the Western Union agent closest to you.
- (2) Obtain Quick Collect payment form from your Western Union agent. Fill out the Quick Collect payment form completely. Make it payable to CACH, LLC. The code city is CACH CO and the account number will be your account number found on the front of this letter.
- (3) Give the agent the completed Quick Collect form, the payment amount, and the transaction fee (presently \$12.95) required and payable to Western Union in cash.

You will receive a receipt from the Western Union agent with a ten-digit control number. This number is proof that the money was sent. Please retain that receipt for your records.

OF COUNSEL

William Boaz (OR)
William T. Sali (ID)
Angela L. Burmeister (NE, IA, MO, KS)
Thomas M. McGreal (HI, CA)
Joseph A. Geller (NV)

www.mandarichlaw.com

You may also contact us via email at
info@mandarichlaw.com



THOMAS S WEINSTEIN
400 BLAINE ST
SEATTLE, WA 98109-2944

139006
3027

139006



September 14, 2016

RE: Current Creditor: CACH, LLC
Account No.: [REDACTED] 5742
Original Creditor: GE CAPITAL RETAIL BANK
Original Creditor Account No.: [REDACTED] 5391

Dear THOMAS S WEINSTEIN,

In accordance with your agreement with our office, and pursuant to your authorization, we will be debiting \$97.33 from your bank account on 2016-09-27. Please ensure these funds are available on or before the processing date.

Please feel free to contact our office toll-free at 1-855-441-5983 to discuss your account.

Sincerely,

Mandarich Law Group, LLP

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IMPORTANT INFORMATION CONTINUED ON THE REVERSE SIDE.

CALIFORNIA
9200 Oakdale Avenue, Suite 601
Chatsworth, California 91311

ILLINOIS
1 N. Dearborn Street, Suite 650
Chicago, Illinois 60602



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We are required under state and/or federal law(s) to notify consumers of certain rights. This list does not include a complete list of rights you may have under state or federal laws or regulations. Federal Law or other state laws may also provide you with similar or even greater rights.

In California: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact The Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov. As required by law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted by the creditor to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

In Colorado: FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE WWW.COAG.GOV/CAR. A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

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Our clients may report information about your account to credit bureaus.

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(3) Give the agent the completed Quick Collect form, the payment amount, and the transaction fee (presently \$12.95) required and payable to Western Union in cash.

You will receive a receipt from the Western Union agent with a ten-digit control number. This number is proof that the money was sent. Please retain that receipt for your records.

Attorneys:

Christopher D. Mandarich (CA)
Michael D. Mandarich (CO)
John C. Bonewicz (IL)
Ryan E. Vos (AK, CA, ID, OR, WA)
Anthony F. Porto (MO)

Of Counsel:

William Boaz (OR)
William T. Sali (ID)

Angela L. Burmeister (NE, IA, MO, KS)
Thomas M. McGreal (HI, CA)
Joseph A. Geller (NV)
Mathew S. LaCroix (WA)

THOMAS S WEINSTEIN
400 BLAINE ST
SEATTLE WA 98109-2944



RE: Customer Name: THOMAS WEINSTEIN
Current Creditor: CACH, LLC
Current Creditor Account Number: [REDACTED] 5742
Original Creditor: GE CAPITAL RETAIL BANK
Original Creditor Account Number: [REDACTED] 5391

Date: December 15, 2016

Dear THOMAS S WEINSTEIN,

In accordance with your agreement with our office, and pursuant to your authorization, we will be charging your credit/debit card in the amount of \$97.33 on 12/27/2016.

Please feel free to contact our office toll-free at 855.441.5983 to discuss your account.

Sincerely,
Mandarich Law Group, LLP

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California Residents: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact The Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov. As required by law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted by the creditor to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

Colorado Residents: FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE WWW.COAG.GOV/CAR. A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

Maine Residents: Office Location: 9200 Oakdale Ave. Suite 601, Chatsworth, CA 91311. Phone: 855.441.5983. Business hours: Mon. - Fri. 9 am to 5 pm (PST).

Massachusetts Residents: Office Location: 9200 Oakdale Ave. Suite 601, Chatsworth, CA 91311. Phone: 855.441.5983. Business hours: Mon. - Fri. 9 am to 5 pm (PST).

Massachusetts law requires that we inform you:

NOTICE OF IMPORTANT RIGHTS for Massachusetts Residents

You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

However, please be advised that we will honor an oral request that telephone calls not be made to your place of employment without written confirmation of the request.

Texas Residents: Office Location: 9200 Oakdale Ave. Suite 601, Chatsworth, CA 91311. Phone: 855.441.5983. Business hours: Mon. - Fri. 9 am to 5 pm (PST).

Utah Residents: As required by Utah law, you are hereby notified that a negative credit report reflecting your credit record may be submitted by a creditor to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

IMPORTANT INFORMATION ABOUT CREDIT REPORTING

Our clients may report information about your account to credit bureaus.